



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 15, 2015

**BY ECF AND HAND DELIVERY**

The Honorable Thomas P. Griesa  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Prevezon Holdings, Ltd., et al.*, 13 Civ. 6326 (TPG)**

Dear Judge Griesa,

The Government and defense counsel write to present the Court with a joint proposed discovery schedule pursuant to the Court's May 29, 2015 Order, Docket Item ("D.I.") 288.

The parties have agreed to the following schedule governing the near-term stages of discovery productions:

The Government shall make a substantial initial production of documents, initial disclosures pursuant to Rule 26(a), amended responses to the defendants' first set of interrogatories, and additional information consistent with the Court's comments at the last conference, by today, June 15, 2015, and shall continue to produce documents on a rolling basis.

The defendants shall make a substantial initial production of documents and initial disclosures pursuant to Rule 26(a) by June 26, 2015.

The parties shall serve supplemental discovery requests by July 12, 2015, without prejudice to serve further discovery requests, should such requests be necessary due to additional information received after that date.

The parties shall continue to confer in good faith regarding the next phases of the discovery schedule and shall propose further schedules to the Court as they are determined.

Respectfully submitted,

PREET BHARARA  
United States Attorney

by: /s/ Paul M. Monteleoni  
Paul M. Monteleoni  
Andrew C. Adams  
Margaret Graham  
Assistant United States Attorneys  
(212) 637-2219/2340/2923

cc: Counsel of Record (by ECF)